

Appln. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

### REMARKS/ARGUMENTS

The office action mailed August 3, 2005, has been carefully reviewed and the remarks are responsive to that office action. Reconsideration and allowance of this application are respectfully requested.

Claims 1-14 remain in the application. Claims 1-5 were rejected under 35 USC 103(a) as being unpatentable over Heiny (U.S. Patent 5,778,356) in view of Mullaney (U.S. Patent 5,917,484). Claims 6-14 were rejected under 35 USC 103(a) as being unpatentable over Heiny. Claim 1 is currently amended.

Claim 1 recites a computer-readable medium having computer-executable instructions for performing steps comprising: allowing a user to select a language in which at least a portion of an electronic file is to be displayed; receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed; at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user; and displaying to the user the second plurality of phrases that are expressed in the language selected by the user.

In contrast to the invention as recited in claim 1, Heiny discloses a client-server system in which a server computer performs server-side translation of knowledge-base data before sending the data to a user's client computer for display to the user. Heiny discloses a database management system that allows various users to simultaneously access data in a knowledge base

Appln. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

in different languages. (Col. 2, lines 62-65). The system provides users with remote access to a knowledge base server over a network such as the Internet using executable content in a Java enabled client based HTML interpreter or browser application. (Col. 3, lines 9-14). The server 132 (Figure 4 and col. 8, lines 6-9) uses data structures with pointers and language handles to access knowledge-base information in a language specified by the user. The server then provides the information to the user's client computer for display to the user. Accordingly, Heiny teaches server-side localization (i.e., language translation), not client-side localization of knowledge-base data.

Heiny and Mullaney, either alone or in combination, do not disclose receiving an electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed. With the exception of initially displaying the names of various languages in each respective language, such as "English," "Duetsch," and "Espanol," Heiny teaches transmission of knowledge-base data expressed in a single user-selected language at any particular time. Heiny does not teach or suggest transmission from a server to a client of a single electronic file containing a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed.

Mullaney discloses techniques for configuring a computer's "system locale," which is made up of a language, a territory, and a code set. Mullaney teaches displaying the phrase

Appl. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

"Select your language" in multiple languages. The computer then awakes, upon restart, with its system locale set according to the language selected by the user. (Col. 3, lines 31-39).

Mullaney does not teach or suggest "a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed." Mullaney teaches a single phrase (i.e., "Select your language") expressed in multiple languages. (Col. 4, lines 18-20). The phrase "Select your language" and each of this phrase's foreign-language translations disclosed by Mullaney have the same meaning regardless of the language in which the translations are expressed. Accordingly, the phrase "Select your language" and each of this phrase's foreign-language translations disclosed by Mullaney do not have meanings that are different than the meanings of the other language translations regardless of the language in which the translations are expressed. Mullaney does not, therefore, teach or suggest "a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed."

Heiny and Mullaney, either alone or in combination, also do not teach or suggest selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user. As previously discussed, Heiny teaches server-side localization (i.e., language translation), not client-side localization of data. And as previously discussed, Heiny and Mullaney do not teach or suggest receiving an electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases,

Appl. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed. Consequently, Heiny and Mullaney also do not teach or suggest selecting a second plurality of phrases from such a first plurality of phrases.

The invention as recited in claim 1 provides significant advantages over the prior art of record by allowing a user to select a language in which at least a portion of an electronic file should be displayed to the user, without requiring any additional downloads of any additional electronic files. In this way, separate electronic files that are stored at separate locations are not needed thereby reducing the amount of data that needs to be stored and the amount of network traffic needed for displaying the electronic document in a language selected by the user.

Accordingly, Heiny and Mullaney, either alone or in combination, fail to establish prima facie obviousness of the invention of claim 1 because Heiny and Mullaney fail to teach or suggest: (1) receiving an electronic file at the user's computer, wherein the electronic file's content includes a plurality of phrases, wherein each phrase of the plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed; and (2) at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user, as recited in claim 1.

Claim 6 recites a method of providing an electronic file to a user comprising the steps of: assigning to at least one word in the electronic file a plurality of identifiers, wherein each

Appl. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

identifier corresponds to one of a plurality of respective translations in the electronic file for said at least one word; and at a receiving computer: receiving the electronic file from a sending computer, allowing the user to select a language in which at least a portion of the electronic file is to be displayed, using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, inserting the translation obtained from the electronic file into a translated electronic file, and displaying the translated electronic file to the user.

In contrast to the invention as recited in claim 6, Heiny discloses server-side localization (i.e., language translation) of knowledge-base data, which is sent to a user's client computer for display to the user. Heiny, therefore, does not teach or suggest client-side localization by performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, and (2) inserting the translation obtained from the electronic file into a translated electronic file.

Page 4 of the office action states that Heiny does not teach "inserting the translation" and that it would have been obvious to have applied Heiny's teaching to include "inserting the translation" because doing so would have provided the capability for efficiently retrieving and displaying the document in the language selected by the user. Applicant respectfully disagrees. The office action does not explain how "inserting the translation" would provide the capability of increased efficiency in retrieving and displaying the document in the language selected by the

Appl. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

user. Page 4 of the office action states further that Heiny teaching retrieving and displaying information based on a language handle, which corresponds to the language selected by the user, suggests inserting the translation. Applicant respectfully disagrees. The office does not explain how retrieving and displaying information based on a language handle, which corresponds to the language selected by the user, suggests inserting the translation. As such, neither of the rationales on page 4 of the office action, either alone or in combination, set forth a convincing line of reasoning as to why a person of ordinary skill in the art would have been motivated to modify Heiny's disclosure as suggested in the office action.

For at least the foregoing reasons, Heiny fails to establish prima facie obviousness of the invention of claim 6.

Claim 14 recites a method of displaying at least a portion of a document in a language selected by a user, said method comprising the steps of: assigning to a plurality of words in the document a plurality of identifiers, wherein each identifier corresponds to a respective one of a plurality of translations for said plurality of words; and at a receiving computer: (1) receiving the document from a sending computer, (2) allowing a user to select a language in which the document is to be displayed, (3) using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the user, (4) replacing the plurality of words in the document by inserting into the document the selected plurality of respective translations for the plurality of words, and (5) displaying the document to the user.

In contrast to the invention as recited in claim 14, Heiny discloses server-side localization (i.e., language translation) of knowledge-base data, which is sent to a user's client computer for

Appln. No.: 09/309,372  
Amendment dated September 30, 2005  
Reply to Office Action mailed August 3, 2005

display to the user. Accordingly, Heiny does not teach or suggest performing the following two steps at the receiving computer: (1) using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the client, and (2) replacing the plurality of words in the document by inserting into the document the selected plurality of respective translations for the plurality of words. For at least these reasons, Heiny fails to establish prima facie anticipation or obviousness of the invention of claim 14.

Claims 2-5 and 7-13 properly depend upon claims 1 and 6, respectively. Therefore, these dependent claims are in condition for allowance for at least the reasons discussed above in connection with claims 1 and 6.

#### CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicant respectfully submits that this application is in condition for allowance, and respectfully requests issuance of a notice of allowance.

Respectfully submitted,

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Dated: September 30, 2005

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